

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:  
Plaintiffs' Amended Master Administrative  
Long-Form Complaint and the Applicable  
Short-Form Complaints

**DEFENDANTS NATIONAL FOOTBALL LEAGUE'S AND NFL PROPERTIES  
LLC'S MOTION TO DISMISS THE AMENDED MASTER ADMINISTRATIVE  
LONG-FORM COMPLAINT ON PREEMPTION GROUNDS**

Defendants National Football League and NFL Properties LLC (collectively, the "NFL Defendants") move pursuant to Federal Rule of Civil Procedure 12(b)(6) to dismiss, with prejudice, Plaintiffs' Amended Master Administrative Long-Form Complaint and the applicable Short-Form Complaints on preemption grounds. In support of this motion, the NFL Defendants rely on the points and authorities in the accompanying memorandum of law, and the accompanying Declaration of Dennis L. Curran and exhibits thereto, which the NFL Defendants submit herewith and incorporate herein in their entirety.

The NFL Defendants respectfully request oral argument on this motion.

Respectfully submitted,

Dated: August 30, 2012

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NFL Properties LLC*

**CERTIFICATE OF SERVICE**

I, Nathan M. McClellan, hereby certify that on August 30, 2012, I electronically filed the foregoing Motion to Dismiss the Amended Master Administrative Long-Form Complaint on Preemption Grounds, the Memorandum of Law in support thereof, the Declaration of Dennis L. Curran, and the associated exhibits, and electronically served them via the Court's CM/ECF system on all counsel of record.

Dated: August 30, 2012

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